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Kathy - Wilson  
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Body and Assembly  
Ford Motor Company

Wixom Assembly Plant  
50000 Grand River Expressway  
P.O. Box 1  
Wixom, Michigan 48096

December 29, 1989

Roy Schrameck, District Supervisor  
Detroit Area District Office  
505 West Main Street  
Northville, Michigan 48167

Subject: NPDES Permit No. MI0028151  
Wixom Assembly Plant

Dear Mr. Schrameck:

As required by NPDES Permit NO. MI0028151, Part I, Section A.1, we are submitting the following Toxic Organic Pollutant Management Plan as pertains to process Outfall 001.

Should you require further information, please contact me at (313) 344-5286.

Sincerely,

John P. Lee  
Environmental Control Specialist

Enclosure

cc: V. H. Sussman  
A. M. Twilley

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**ORGANIC SOLVENT MANAGEMENT PLAN  
FORD MOTOR COMPANY  
WIXOM ASSEMBLY PLANT**

**I. PROCESS DESCRIPTION**

The Wixom Assembly Plant assembles the Lincoln Town Car, Mark VII, and Continental luxury automobiles from parts manufactured at other locations. The assembly process includes welding and sealing of sheet metal body components, metal finishing, cleaning, phosphatizing, color coating, and final assembly.

The plant currently produces roughly 51 vehicles per hour. Production is currently scheduled for two 10 hour shifts per day, 5 days per week, with occasional Saturday operation.

Wastewater is generated by the various operations required for assembly such as body washing and leak testing. Miscellaneous sources such as cooling tower blowdown and general building maintenance also contribute significantly to the waste stream. Treatment of this waste stream is accomplished by chemical precipitation with solids removal, biological treatment, and filtration. The treated effluent discharges to the Congdon Drain, part of the feeder network of the Huron River watershed.

**II. SOLVENT USAGE AND CONTROLS**

Various operations within the assembly plant involve the use of organic solvents and/or cleaners which may contain one or more Total Toxic Organics as defined in Part I, Section A.8 or the permit. These solvents and cleaners are used in various stages of assembly prior to vehicle coating, coating formulation, equipment clean-up and fueling of production and operational units.

Toxic organic chemicals to be found on site include the following:

Benzene .....	Gasoline
Naphthalene .....	Paint Solvent, Cleaning Solutions
Toluene .....	Paint Solvent, Cleaning Solutions
PCB .....	Transformer Dielectric Fluid
Di-N-Octyl Phthalate .....	Sealer (Mixture Component)
Methylene Chloride .....	Adhesion Primer

These TTO containing materials are collected for reclamation where possible. Materials that cannot be reclaimed are collected for disposal via offsite licensed disposal facilities. Due to the BTU value of the materials, the normal method of disposal utilized is fuel blending. Materials and material containers that cannot be disposed of through fuel blending are transported to a licensed hazardous landfill for ultimate disposal. The plant maintains collection/storage facilities for the materials as mandated by the RCRA. All materials are transported to disposal facilities by licensed contract haulers.

Material control is based on inventory balance. All waste material is tracked via the Uniform Waste Manifest System. All materials are maintained in areas and tanks which are secure and provide containment should an unexpected leak occur.